

Schindler Elevator Corporation



October 13, 2006

VIA ELECTRONIC MAIL

State of California
State and Consumer Services Agency
California Building Standards Commission
Attention: Jane Taylor, Associate Architect
2525 Natomas Park Dr., Suite 130
Sacramento, CA 95833

Re: Introduction of Destination-Oriented Elevators Into New California Building Code

Dear Ms. Taylor:

We write to suggest revisions to the current Text of the Regulations in order to address and include Destination Oriented Elevators within the revised California Building Code currently being considered by the Building Standards Commission. The current California Building Code, and the proposed amendment thereto, does not include provisions accommodating Destination Oriented Technology, despite the inclusion of such provisions in the 2003 ADAAG and the 2006 International Building Code, and the use of such technology in more than 21 major U.S. cities and 35 countries worldwide.

In the attached submission, Schindler Elevator Corporation proposes to amend the language of the following provisions of Title 24, Part 2, Chapter 11B:

- 1116B.1 (Elevators.);
- 1116B.1.6 (Hall Call.);
- 1116B.1.8 (Car Inside)(there are two proposals for this provision which are not mutually exclusive – they are independent);
- 1116B.1.9 (Car Controls.);
- 1116B.1.10 (Hall Call Buttons);
- 1116B.1.13 (Hall Lantern); and
- 1116B.1.14 (Doorjamb Marking).





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All of the proposed revisions are to accommodate destination oriented elevators which cannot comply with existing Code due to the fundamental difference in the operation of the system as a destination rather than direction oriented technology.

I. BACKGROUND OF DESTINATION ORIENTED TECHNOLOGY

Destination-oriented elevator technology alters the traditional direction-based operation of elevators. Instead of pressing an “up” or “down” button, and then randomly entering the first available elevator car, each passenger enters his or her destination floor on a keypad in the elevator lobby, and the system directs the passenger to the optimal elevator. Since the destination oriented technology knows passenger destination, and not just direction, the elevator group control system provides a more intelligent elevator dispatching response, which results in significantly shorter trip times, reduced car crowding and reduced energy consumption, when compared to a conventional system, as well as enhanced audio and visual prompts for passengers with disabilities. A destination oriented system also provides better elevator loading and exiting for passengers with disabilities, by allowing increased time for reaching and entering an elevator car, and increased time for door opening and closing.

II. BENEFITS OF DESTINATION ORIENTED TECHNOLOGY

A. Additional Features for the Disabled Community

The destination oriented technology provides numerous advantageous features and benefits to the disabled community that are absent from traditional elevators, including:

- A standard telephone keypad arrangement with a universally accepted dot on the “5” key of the keypad to orient visually impaired users to the other numbered keys;
- A long accessibility button located immediately below the keypad arrangement containing the international symbol for accessibility and three raised dots in the form of an equilateral triangle as specified under the ANSI 407.2.1.7 standard;
- Upon pressing the accessibility key and the floor designation, the keypad immediately begins an audible communication;
- The keypad communicates both visually and audibly indicating to which elevator a passenger should proceed;
- The selected elevator provides visual and audible identification, announcing its arrival;
- The time allowed until the elevator arrives is in excess of typical industry standards, and allows sufficient time for travel by wheelchair;



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- The door dwell time is increased for passengers with disabilities (doors stay open longer); and
- Reduction of crowding in the lobby and elevator cars, resulting in clearer path of travel for individuals with disabilities.

B. Widespread Use and Satisfaction

As noted above, destination oriented technology is in use in more than 21 major cities in the U.S. and 35 countries worldwide. There have been numerous articles written in support of this destination oriented technology, particularly in regard to the Times Square Marriott. The benefits of the technology have been described as:

- “No more waiting. No more crowds jamming in, no more tedious stopping at a different floor for each passenger. . . This delivers people faster and smoother than anything else. . .” (Supplement to South Florida Business Journal, April 25, 2003)
- “It saves people rushing to get to the first available elevator and crowding into cars. *It also offers special features for people with disabilities*, can be tied into existing building systems, and, most crucially, speeds up the journey time by up to 30%. [Destination oriented technology] allocates elevator cars to individual passengers even during the busiest rush hours, makes sure you have enough time to reach the elevator without having to hurry and makes special allowances for wheelchair users and the visually impaired.” (Business Traveler USA, May 2005)(emphasis added).
- “Moving people more efficiently is the obvious benefit of the system. . . .The system eliminates overcrowding through sensors that relay when the elevator is overweight. . . . [T]he system may also help save money in either build-to-suit constructions or existing buildings.” (Commercial Property News, May 16, 2003)
- “[Destination oriented technology] not only assigns elevators, it records usage patterns and uses the data to increase service to specific floors at certain times. The computer also gives security guards and engineers the ability to monitor elevators as well as cull data to gauge performance.” (Los Angeles Downtown News, November 14, 2005)
- “Instead, after keying in the floors they want to go to, passengers are assigned to specific cars, which deliver them to their requested floor with no, or only a few, stops along the way. That dramatically reduces the most common complaints about elevators: long waits for a car and long times to reach a floor after boarding. Manufacturers of the high-tech machines say their efficiency makes riding them



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like taking a taxi, while using conventional elevators is akin to riding a bus.”
(Boston Globe, October 9, 2006).

C. Benefits to the State of California

In addition to the specific benefits afforded the disabled community, the public derives very substantial benefits from the destination oriented technology, as it has promoted significant energy savings based upon the more efficient usage of elevator cars. The energy conservation features of the destination oriented technology are consistent with California’s “Flex Your Power” energy conservation campaign and the Governor’s Green Building Action Plan to reduce energy consumption on a long-term basis.

In Executive Order S-20-04, and the accompanying State of California Green Building Action Plan, Governor Schwarzenegger has encouraged commercial buildings to utilize energy-saving technology:

“10. Commercial building owners are also encouraged to take **aggressive action** to reduce electricity usage by retrofitting, building and operating the most energy and resource efficient buildings by taking measures described in the Green Building Action Plan.”

The Green Action Building Plan sets a goal of 20% energy reduction for state-owned buildings by 2015. Building owners in San Francisco using the destination oriented technology have documented substantial energy savings. Specifically, by using Schindler’s destination oriented system, one building owner has reduced its elevator energy usage by 23% as compared to the same eight-month period in 2005, and another conducted an energy savings study in partnership with PG&E for which PG&E noted that “[b]esides the business benefits from your measures, California will see a reduction of 317,800 kWh and 21.3 kW reduction.”¹

III. ACCESSIBILITY CODE TREATMENT OF DESTINATION ORIENTED TECHNOLOGY

The current version of the International Building Code (“IBC”) adopts ICC/ANSI A117.1 (2003) which includes, at Section 407, “exceptions” for destination oriented technology. The IBC acknowledges that destination oriented technology operates fundamentally differently from a direction oriented system such that destination oriented elevators cannot strictly comply with existing accessibility codes.

¹ Schindler will provide citation to supporting data as required by BSC.

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The current ADAAG was developed in 1991 and remains substantially unchanged. The 1991 ADAAG (current Federal Code) does not include destination oriented elevator technology, as it was not mature technology when the 1991 Code was developed. A revised version of the ADAAG was developed in 2004 ("2004 ADAAG") by the Architectural, Transportation, Barriers Compliance Board (ATBCB), now called the Access Board. The 2004 ADAAG includes destination oriented elevator technology as approved technology in Section 407. Section 407 was based upon 2003ANSI A117.1, Section 407. The 2004 ADAAG is awaiting the implementing regulations from the US Department of Justice.

IV. PROPOSED AMENDMENTS TO EXISTING TITLE 24 PROVISIONS

In order to accommodate destination oriented elevators, Schindler proposes modifications to the existing language of Title 24, Part 2, Chapter 11B as outlined on the attached forms.

Specifically, Schindler proposes to amend the language of provisions 1116B.1 (Elevators.); 1116B.1.6 (Hall Call.) 1116B.1.8 (Car Inside); 1116B.1.9 (Car Controls.); 1116B.1.10 (Hall Call Buttons); 1116B.1.13 (Hall Lantern); and 1116B.1.14 (Doorjamb Marking) to accommodate destination oriented elevators which cannot comply with existing Code due to the fundamental difference in the operation of the system as a destination rather than a direction oriented system.

V. CONCLUSION

Destination oriented elevators are provided for in the IBC, the 2003 ICC/ANSI A117.1 and the 2004 ADAAG. Schindler strongly urges the Building Standards Commission to adopt the revisions proposed by Schindler in the attached forms in order to accommodate destination oriented elevators in California's next Building Code revision.

Very truly yours,

William E. Mitchell

Technical Support – Field Service Adjuster

Schindler Elevator Corporation

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
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(916) 263-0916 Phone
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Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 22, 2006
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 16, 2006

Date: 10/13/06

From:

William E. Mitchell
Name (Print or type)


(Signature)

-- Schindler Elevator Corporation

Agency, jurisdiction, chapter, company, association, individual, etc.

<u>555 McCormick Street</u>	<u>San Leandro</u>	<u>CA</u>	<u>94577-1107</u>
Street	City	State	Zip

I/We (do)(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1102B

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Add:

ELEVATOR, DESTINATION ORIENTED PASSENGER

An elevator system that provides lobby controls for the selection of destination floors, lobby indicators designating which elevator to board, and a car indicator designating the floors at which the car will stop.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

In the same manner that DSA/AC proposed to adopt and relocate the definition for ELEVATOR, PASSENGER a definition for ELEVATOR, DESTINATION ORIENTED PASSENGER should be added to Section 202 with a cross reference to Section 1102.1. This and associated notes which apply to all submitted comments will update California to correspond with other documents as noted.

Note 1: An ADAAG Manual was developed by the U.S. Architectural and Transportation Barriers Compliance Board in July 1998. Page 49 mentions that ADAAG does not specifically address Destination Oriented Elevators but does say that where provided, destination-oriented elevators must meet the technical requirements in 4.10 as appropriate. The footnote on the last page says: U.S. GOVERNMENT PRINTING OFFICE: 1999-450-205/10138

Note 2: (ADA/ABA Guidelines). In 2004, the Access Board issued updated guidelines for new and altered facilities covered by the ADA and the ABA. These guidelines include requirements for Destination Oriented Elevators and are currently under review by the US DOJ. These updated guidelines are not yet effective.

Note 3: Destination Oriented Elevators also have been recognized by the 2006 IBC by it's reference to ICC/ANSI A117.1-2003 as well as the reference in the previous edition to ICC/ANSI A117.1 –1998

Note 4: The Canadian Building code adopts CSA B44-2000, Appendix E as mandatory: thus including Destination Oriented Elevator requirements almost identical to the ICC/ANSI A117.1.

Note 5: The CEN has adopted the EN81 series of codes which also cover Destination Oriented passenger elevators. (the term "lift" is used in lieu of the term "elevators").

Note 6: The dispatch systems for these elevators are usually used in large buildings with Multi-car elevator banks and result in lower energy consumption and thus lower costs to building owners.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.

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WRITTEN COMMENT DEADLINE: OCTOBER 16, 2006

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From:

William E. Mitchell
Name (Print or type)


(Signature)

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Agency, jurisdiction, chapter, company, association, individual, etc.

<u>555 McCormick Street</u>	<u>San Leandro</u>	<u>CA</u>	<u>94577-1107</u>
Street	City	State	Zip

I/We (do)(do not) agree with:

☒ The Agency proposed modifications As Submitted on Section No. 1116B.1

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☐ Held for Further Study ☒ Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Modify 1116B.1 as indicated by double underline (current proposal already includes single underlines):

1116B.1 Elevators. Elevators Passenger elevators including Destination Oriented Passenger elevators shall be accessible. Elevators required to be accessible shall be designed and constructed to comply with this section and with the ASME A17.1 Safety Code for Elevators and Escalators.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1-Elevators

New language added to 1116B.1. Destination Oriented elevators need to be included since the ADAAG Manual July 1998 (1999-450-205/10138) advises that they must meet the technical requirements of 4.10 as appropriate.

HEALTH & SAFETY CODE SECTION 18930

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 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
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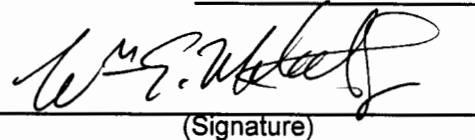
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Street City State Zip

I/We (do)(do not) agree with:

☒ [X] The Agency proposed modifications As Submitted on Section No. 1116B.1.6

and request that this section or reference provision be recommended:

☐ [] Approved ☐ [] Disapproved ☐ [] Held for Further Study ☒ [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Amend 1116B.1.6 as follows (double strikeout or double underline are used since single strikeout and underline are in proposed text)

1116B.1.6 Hall call. The minimum acceptable time from notification that a car is answering a call (lantern and audible signal) until the doors of the car start to close shall be calculated by the following equation:

$$T = D / (1.5 \text{ ft/s}) \text{ or } T = D / (445 \text{ } \underline{455} \text{ mm/s})$$

For Destination Oriented passenger elevators, T is the total time in seconds and D is measured from the call buttons or keypad at which the car floor is entered to the hoistway door centerline of the designated car. T begins when the car designation is given at such call button or keypad.

For other passenger elevators where T is the total time in seconds and D is the distance from a point in the lobby or landing area 60 inches (1524 mm) directly in front of the farthest call button controlling that car to the centerline

of its hoistway door (see Figure 11B-40D). For cars with in car lanterns, T begins when the lantern is visible from the vicinity of hall call buttons and an audible signal is sounded.

The minimum acceptable notification time shall be 5 seconds.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1111B.1.6-Hall Call

On Destination Oriented passenger elevators the passenger is assigned to take a specific car and can immediately walk to it. The location of all call buttons or keypads and centerlines of all doors have been stored into system memory so no passenger will get less time than needed. On other elevators the passenger does not know what car will be available and has to wait to see what car will arrive. Thus the timing is calculated differently. Additional language has been added to clarify this. This rule currently exists in 407.3.6 of A117.1-1998.

HEALTH & SAFETY CODE SECTION 18930

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 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
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 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
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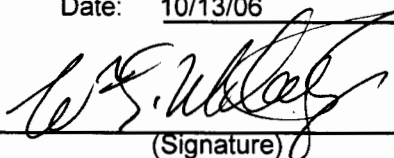
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I/We (do)(do not) agree with:

☒ The Agency proposed modifications As Submitted on Section No. 1116B.1.8

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☐ Held for Further Study ☒ Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/VAC – US DOF ADA CERTIFICATION CODE ADOPTION

Amend 1116B.1.8 as follows: (double strikeout and underline are used to avoid confusion with existing single strikeout and underline)

1116B.1.8 Car Inside. The car inside shall allow for the turning of a wheelchair. ~~The minimum clear distance between walls or between wall and door, excluding return panels, shall not be less than 80 inches by 54 inches (2032 mm by 1372 mm) for center opening doors, and 68 inches by 54 inches (1727 mm by 1372 mm) for side slide opening doors. See Figure 11B-40A. Minimum distance from wall to return panel shall not be less than 54 inches (1295 mm).~~ Inside dimensions of elevator cars and clear width of elevator doors shall comply with Table 1116B1.8.

**Table 116B1.8 Elevator Car Dimensions
Minimum Dimensions**

Door Location	Door Clear Width	Inside Car, Side to Side	Inside Car, Back Wall to Front Return	Inside Car, Back Wall to Inside Face of Door
Centered	42 inches (1065 mm)	80 inches (2030 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Side (off-centered)	36 inches (915 mm) ¹	68 inches (1725 mm)	51 inches (1295 mm)	54 inches (1370 mm)
Any	36 inches (915 mm) ¹	54 inches (1370 mm)	80 inches (2030 mm)	80 inches (2030 mm)
Any	36 inches (915 mm) ¹	60 inches (1525 mm) ²	60 inches (1525 mm) ²	60 inches (1525 mm) ²

1. A tolerance of minus 5/8 inch (16 mm) is permitted.

2. Other car configurations that provide a turning space with the door closed shall be permitted.

The centerline of elevator floor buttons shall be no higher than 54 inches (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. ~~Except for photoelectric tube bypass switches,~~
Emergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor.

For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provide with visual indicator to show when each call is registered. The visual indicators shall be extinguished when each call is answered.

Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1. The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with Section 1117B.5.1 Item 1 and located adjacent to the device. If the telephone system is located in a closed compartment, the compartment door hardware shall lever type conforming to the provisions of Section 1003.3.1.8 1008.1.8. type of lock or latch. Emergency inter communication shall not require voice communication.

Note: Where possible, a 48-inch (1219 mm) maximum height for elevator floor buttons is preferred
Controls shall be located on a front wall if cars have center opening doors, and at the side wall or at the front wall next to the door if cars have side opening doors. See Figure 11B-40A.

Reason: [Threason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/VAC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.8-Car Inside

Inside car dimension permitted should be the same as in ICC/ANSI A117.1 and ADA/ABA AG. The table provides additional clarification.

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 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
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STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 22, 2006
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 16, 2006

From: _____ Date: 10/13/06

William E. Mitchell (Signature)
Name (Print or type)

-- Schindler Elevator Corporation

Agency, jurisdiction, chapter, company, association, individual, etc.

555 McCormick Street San Leandro CA 94577-1107
Street City State Zip

I/We (do)(do not) agree with:

[X] The Agency proposed modifications As Submitted on Section No. 1116B.1.8

and request that this section or reference provision be recommended:

[] Approved [] Disapproved [] Held for Further Study [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Amend 1116B.1.8 as follows: (double strikeout and underline are used to avoid confusion with existing single strikeout and underline)

1116B.1.8 Car Inside. The car inside shall allow for the turning of a wheelchair. The minimum clear distance between walls or between wall and door, excluding return panels, shall not be less than 80 inches by 54 inches (2032 mm by 1372 mm) for center opening doors, and 68 inches by 54 inches (1727 mm by 1372 mm) for side-slide opening doors. See Figure 11B-40A. Minimum distance from wall to return panel shall not be less than 51 inches (1295 mm).

~~The centerline of elevator floor buttons shall be no higher than 54 inches (1372 mm) above the finish floor for side approach and 48 inches (1219 mm) for front approach. Except for photoelectric tube bypass switches,~~

eEmergency controls, including the emergency stop and alarm, shall be grouped in or adjacent to the bottom of the panel and shall be no lower than 2 feet 11 inches (889 mm) from the floor.

For multiple controls only, one set must comply with these height requirements. Floor buttons shall be provide with visual indicator to show when each call is registered. The visual indicators shall be extinguished when each call is answered.

Emergency two-way communication systems between the elevator and a point outside the hoistway shall comply with ASME A17.1. The emergency telephone handset shall be positioned no higher than 4 feet (1219 mm) above the floor, and the handset cord shall be a minimum of 2 feet 5 inches (737 mm) in length. It shall be identified by a raised telephone symbol and corresponding Braille lettering complying with Section 1117B.5.1 Item 1 and located adjacent to the device. If the telephone system is located in a closed compartment, the compartment door hardware shall lever type conforming to the provisions of Section 1003.3.4.8 1008.1.8. type of lock or latch. Emergency inter communication shall not require voice communication.

Note: Where possible, a 48-inch (1219 mm) maximum height for elevator floor buttons is preferred. Elevator car call sequential step scanning shall be provided where car control buttons are provided more than 48 inches (1220 mm) above the floor. Floor selection shall be accomplished by applying momentary or constant pressure to the up or down scan button. The up scan button shall sequentially select floors above the current floor. The down scan button shall sequentially select floors below the current floor. When pressure is removed from the up or down scan button for more than 2 seconds, the last floor selected shall be registered as a car call. The up and down scan button shall be located adjacent to or immediately above the emergency control buttons.

Controls shall be located on a front wall if cars have center opening doors, and at the side wall or at the front wall next to the door if cars have side opening doors. See Figure 11B-40A.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.8-Car Inside

The sentence on height limits of elevator floor button centerlines have been struck and Elevator Car Call Sequential Step Scanning has been added as new language to allow full access to individuals of short stature as well and individuals in wheelchairs. This feature was proposed by the elevator industry and currently exists as 407.4.8 in ICC/ANSI A117.1-2003.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

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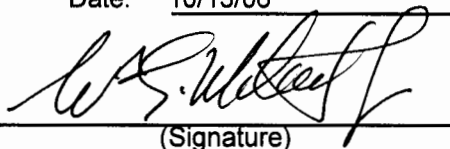
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Date: 10/13/06

From:

William E. Mitchell
Name (Print or type)


(Signature)

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<u>555 McCormick Street</u>	<u>San Leandro</u>	<u>CA</u>	<u>94577-1107</u>
Street	City	State	Zip

I/We (do)(do not) agree with:

☒ The Agency proposed modifications As Submitted on Section No. 1116B.1.9

and request that this section or reference provision be recommended:

☐ Approved ☐ Disapproved ☐ Held for Further Study ☒ Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Modify paragraph on visual car position indicator and add paragraph at end of 1116B.1.9 Car Controls:
(a double strikethrough or underline is used since single strikethroughs and underlines are already used)

1116B.1.9 Car Controls. Identification for the visually impaired shall be as follows:

Passenger elevator car controls shall have a minimum dimension of $\frac{3}{4}$ inch (19.1mm) and shall be raised $\frac{1}{8}$ (3.2mm) plus or minus $\frac{1}{32}$ inch (0.8mm) above the surrounding surface.

Control buttons shall be illuminated, shall have square shoulders, and shall be activated by a mechanical motion that is detectable.

All control buttons shall be designated by 5/8 inch minimum (15.9mm) raised characters that conform to Section 1117B.5.5, or and standard raised symbols that conform to Sections 1117B.5.2, 117B.5.3, 117B.5.5 and 1117B.5.7 immediately to the left of the control button. Grade 2 Braille that conforms to Section 1117B.5.6 shall be located immediately below the character or symbol. A minimum clear space of 3/8 inch (9.5mm) or other suitable means of separation shall be provided between rows of control buttons. ~~Note: See Figure 11B-40B.~~

The raised characters and symbols shall be white on a black background.

Controls and emergency equipment identified by raised symbols shall include, but not be limited to, door open, door close, alarm bell, emergency stop and telephone. The call button for the main entry floor shall be designated by a raised star at the left of the floor designation.

In elevator cars, a visual car position indicator shall be provided above the car control panel or over the door to show the position of the elevator in the hoistway. As the car passes or stops at a floor served by the elevators, the corresponding numerals shall illuminate, and an audible signal shall sound. Numerals shall be a minimum of 1/2 inch (13mm) high. The audible signal shall be no less than 20 decibels with a frequency no higher than 1500 Hz. An automatic verbal announcement of the floor number at which a car stops or which a car passes may be substituted for the audible signal.

In Destination Oriented elevators, a display shall be provided in the car with visible indicators to show car destinations. The visible indicators shall extinguish when the call has been answered. The audible signal shall be a verbal announcement indicating the floor at which the car is about to stop. The verbal announcement indicating the floor shall be completed prior to the initiation of the door opening.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.9-Car Controls

Destination Oriented elevator have only emergency controls and a car position indicator with verbal announcement in the car. They additionally have visible indicators to show car destinations which are often on the car jambs so they are visible from both the lobby and the car. Since audible lobby identification of the car to take is a feature of Destination Oriented elevators the internal car floor announcement needs to be completed before the car doors open to avoid audible overload. New language has been added to cover these points.

Delete the words "or which a car passes" from the language in the paragraph on visual car position indicator. When tones are used a passenger must count so tones are needed at every floor the car passes in order to determine when the car reaches the desired floor. When an arrival floor is announced there is no need to either count or to announce the floors that the car passes.

HEALTH & SAFETY CODE SECTION 18930

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From:

William E. Mitchell
Name (Print or type)


(Signature)

-- Schindler Elevator Corporation

Agency, jurisdiction, chapter, company, association, individual, etc.

<u>555 McCormick Street</u>	<u>San Leandro</u>	<u>CA</u>	<u>94577-1107</u>
Street	City	State	Zip

I/We (do)(do not) agree with:

☒ [X] The Agency proposed modifications As Submitted on Section No. 1116B.1.10
and request that this section or reference provision be recommended:

☐ [] Approved ☐ [] Disapproved ☐ [] Held for Further Study ☒ [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

Amend 1116B.1.10 as follows: (Changes are shown in double underline or strikethrough)

1116B.1.10 Hall Call Buttons. The centerline of the hall call buttons shall be located vertically between 35 inches (890 mm) and 48 inches (1220 mm) ~~42 inches (1067 mm)~~ above the floor. A clear floor space at least 30 inches (760 mm) minimum in width and 48 inches (1220 mm) minimum in depth shall be provided at the buttons. Buttons shall be a minimum of 3/4 inch (19.1 mm) in size and shall be raised 1/8 inch (3.2 mm) {plus or minus 1/32 inch (0.8 mm)} above the surrounding surface. Objects adjacent to, and below, hall call buttons shall not project more than 4 inches (102 mm) from the wall.

For Destination Oriented passenger elevators floor buttons or a keypad in a standard telephone arrangement with a function button located immediately below either arrangement shall be provided. Destination-oriented elevators

shall be provided with visible and audible signals to indicate which car is responding to a call. The audible signal shall be activated by pressing the function button (See 1116B.1.13). Keypads shall be identified by visual characters and shall be centered on the corresponding keypad button. The number five key shall have a single raised dot. The dot shall have a base diameter of 0.118 inch (3 mm) minimum to 0.120 inch (3.05 mm) maximum, and a height of 0.025 inch (0.6 mm) minimum to 0.037 inch (0.9 mm) maximum. The function button shall be identified by the International Symbol of Accessibility and tactile indication. The International Symbol of Accessibility shall be a visual character 5/8 inch (16mm) in height. The tactile indication shall be three dots, spaced 1/4 inch (6.4 mm) at base diameter in the form of an equilateral triangle. For other passenger elevators the button designating the up direction shall be on top. Visual indication shall be provided to show each call registered and shall be extinguished when the call is answered.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.10-Hall Call Buttons

This section has added new language for provisions for Destination Oriented passenger elevators where the hall call buttons are used to enter floor destinations rather than "up" or "down" and a "function button" is used to activate signals used to indicate which car is responding to a call. Added new language to provide for forward reach to all buttons including those in a standard telephone keypad configuration the button height has been changed to range of 35 inches minimum and 48 inches maximum above the floor. To provide forward reach from a wheelchair, a minimum clear floor space at the buttons has been added. Editorial clarification has been shown in last sentence with minor change in language. This point is currently covered by 407.2.2 and 407.3.1 in ICC/ANSI A117.1-1998

HEALTH & SAFETY CODE SECTION 18930

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555 McCormick Street San Leandro CA 94577-1107
Street City State Zip

I/We (do)(do not) agree with

☒ [X] The Agency proposed modifications As Submitted on Section No. 1116B.1.13

and request that this section or reference provision be recommended:

☐ [] Approved ☐ [] Disapproved ☐ [] Held for Further Study ☒ [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION
Amend 1116B.1.13 as follows:

1116B.1.13 Hall Lantern. A visible and audible signal shall be provided at each hoistway entrance indicating the following to the prospective passenger: For Destination Oriented passenger elevators, the car designation that was assigned at the hall call buttons or keypad. Each Destination Oriented passenger elevator in a bank of elevators shall have audible and visible means for differentiation. For other passenger elevators, the car answering the call and its direction of travel. Details are as follows:

The visual signal for either the car designation or each direction shall be a minimum of 2 ½ inches (64 mm) high by 2 ½ inches (64 mm) wide and visible from the proximity of the hall call button or keypad.

For Destination Oriented passenger elevators, the audible signal activated by pressing the function button shall be the verbal announcement of the car designation and means for differentiation. For other passenger elevators, the audible signal shall sound once for the up direction and twice for the down direction or of a configuration that distinguishes between up and down elevator travel shall have verbal annunciators that say "up" or "down".

The centerline of the fixture shall be located a minimum of 6 feet (1829mm) in height from the lobby floor.

For Destination Oriented passenger elevators, the use of a display to indicate car destinations is permitted to be located in or on the car jambs or other suitable location. For other passenger elevators, the use of in-car lanterns, located in or on the car doorjambs, visible from the proximity of the hall call buttons and conforming to the above requirements shall or will be acceptable.

The use of arrow shapes ~~are~~ is preferred for visible directional signals.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.13-Hall Lantern

Language added to cover differences between what Hall lanterns should be expected to indicate where Destination Oriented passenger elevators are installed. Reference is made to 407.2.1.5 exception 1, 407.2.1.7, 407.2.2.3 exception 1, and 407.2.2.4 in ICC/ANSI A117.1-2003.

HEALTH & SAFETY CODE SECTION 18930

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I/We (do)(do not) agree with:

☒ [X] The Agency proposed modifications As Submitted on Section No. 1116B.1.14

and request that this section or reference provision be recommended:

☐ [] Approved ☐ [] Disapproved ☐ [] Held for Further Study ☒ [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Reference: DSA/VAC – US DOF ADA CERTIFICATION CODE ADOPTION

Add a paragraph on car designations to 1116B.1.14: (double underline is used to show addition since requirement already has single underlines)

1116B.1.14 Doorjamb Marking. Passenger elevator landing jambs on all elevator floors shall have the number of the floor on which the jamb is located designated by raised characters that are a minimum of 2 inches (51mm) in height and conform to Section 117B.5.5 and Grade 2 Braille that conforms to Section 1117B5.6 located 60 inches on center) 1524 mm) above the floor on the jamb panels on both sides of the door so that they are visible from within the elevator. On the grade level, a raised five pointed star shall be placed to the left of the raised character. The outside diameter of the star shall be 2 inches. Braille shall be placed below the corresponding raised characters.

Destination Oriented passenger elevators shall additionally provide car identification in raised characters complying with that are a minimum of 2 inches (51mm) in height and conform to Section 1117B.5.5 and Grade 2 Braille that conforms to Section 1117B.5.6 immediately below the floor designation on both jambs.

The raised characters shall other wise comply with Sections 1117B5.3, 1117B.5.4 and 117B.5.2. See Figure 44B-40B-11B-40C. Permanently applied plates are acceptable if they are permanently fixed to the jambs.

Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Amend Reason for DSA/AC – US DOJ ADA CERTIFICATION CODE ADOPTION

1116B.1.14-Doorjamb Marking

New language added to cover car identification on car jambs. The same type of modification as was made to cover floor identification is being made to cover car designations when Destination Oriented passenger elevators are installed since upon floor entry in the lobby a car assignment is made.

HEALTH & SAFETY CODE SECTION 18930

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 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.

STATE OF CALIFORNIA
STATE AND CONSUMER SERVICES AGENCY
CALIFORNIA BUILDING STANDARDS COMMISSION
2525 NATOMAS PARK DR., SUITE 130
SACRAMENTO, CA 95833
(916) 263-0916 Phone
(916) 263-0959 Fax
Email: BSC@dgs.ca.gov

Office Use Item No. _____

PARTICIPATION COMMENTS FOR THE NOTICE DATED AUGUST 22, 2006
Written comments are to be sent to the above address.

WRITTEN COMMENT DEADLINE: OCTOBER 16, 2006

Date: 10/13/06

From:

William E. Mitchell
Name (Print or type)


(Signature)

--

Schindler Elevator Corporation

Agency, jurisdiction, chapter, company, association, individual, etc.

555 McCormick Street
Street

San Leandro
City

CA
State

94577-1107
Zip

I/We (do)(do not) agree with:

☒ [X] The Agency proposed modifications As Submitted on Section No. 1116B.1.14

and request that this section or reference provision be recommended:

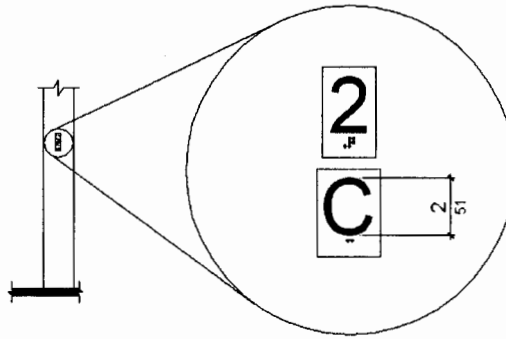
☐ [] Approved ☐ [] Disapproved ☐ [] Held for Further Study ☒ [X] Approved as Amended

by the reviewing Code Advisory Committee.

Suggested Revisions to the Text of the Regulations:

Add new figure to support the amended text on associated 1116B.1.14 comment:

Destination Oriented passenger elevators - Figure __



Reason: [The reason should be concise if the request is for "Disapproval," "Further Study," or "Approve As Amend" and identify at least one of the 9-point criteria (following) of Health and Safety Code §18930.]

Reference: DSA/AC – US DOF ADA CERTIFICATION CODE ADOPTION

The figure shown is the same as has been in ICC/ANSI A117.1-1998 third printing and the same as Fig. 407.2.3.2 now in ICC/ANSI A117.1-2003. A117.1 is a reference document in the IBC. *Note: should be 3 Braille dots in line below the C*
Insertion in Title 24 will assure national consistency.

HEALTH & SAFETY CODE SECTION 18930

SECTION 18930. APPROVAL OR ADOPTION OF BUILDING STANDARDS; ANALYSIS AND CRITERIA; REVIEW CONSIDERATIONS; FACTUAL DETERMINATIONS

- (a) Any building standard adopted or proposed by state agencies shall be submitted to, and approved or adopted by, the California Building Standards Commission prior to codification. Prior to submission to the commission, building standards shall be adopted in compliance with the procedures specified in Article 5 (commencing with Section 11346) of Chapter 3.5 of Part 1 of Division 3 of Title 2 of the Government Code. Building standards adopted by state agencies and submitted to the commission for approval shall be accompanied by an analysis written by the adopting agency or state agency that proposes the building standards which shall, to the satisfaction of the commission, justify the approval thereof in terms of the following criteria:
- (1) The proposed building standards do not conflict with, overlap, or duplicate other building standards.
 - (2) The proposed building standard is within the parameters established by enabling legislation and is not expressly within the exclusive jurisdiction of another agency.
 - (3) The public interest requires the adoption of the building standards.
 - (4) The proposed building standard is not unreasonable, arbitrary, unfair, or capricious, in whole or in part.
 - (5) The cost to the public is reasonable, based on the overall benefit to be derived from the building standards.
 - (6) The proposed building standard is not unnecessarily ambiguous or vague, in whole or in part.
 - (7) The applicable national specifications, published standards, and model codes have been incorporated therein as provided in this part, where appropriate.
 - (A) If a national specification, published standard, or model code does not adequately address the goals of the state agency, a statement defining the inadequacy shall accompany the proposed building standard when submitted to the commission.
 - (B) If there is no national specification, published standard, or model code that is relevant to the proposed building standard, the state agency shall prepare a statement informing the commission and submit that statement with the proposed building standard.
 - (8) The format of the proposed building standards is consistent with that adopted by the commission.
 - (9) The proposed building standard, if it promotes fire and panic safety as determined by the State Fire Marshal, has the written approval of the State Fire Marshal.